

1 Odenat

2 A. Use Whoo Kid image.

3 Q. You said use Whoo Kid image --

4 A. Because I worked for him.

5 Q. Right, you said that.

6 A. And I keep saying that.

7 Q. Yeah, you've said it. You said that
8 already, and I'm going to ask you more about
9 that. You said use Whoo Kid image and
10 instead of using solely Whoo Kid image,
11 whoever this person is who put it together
12 for you, whose name you don't recall, used
13 all of the members of G-Unit; is that right?

14 A. Since they all affiliated, yes.

15 Q. So they did not really carry out your
16 instructions; is that right?

17 A. Yes.

18 Q. And you put it up anyway and kept it
19 up for some period of time; is that right?

20 A. Because they're all affiliated with
21 G-Unit.

22 Q. You need to answer my question. You
23 can then explain your answer, but you still
24 need to answer my question.

25 A. All right. Repeat the question.

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2 were?

3 A. There was many. I don't know, maybe
4 dozens until that cut off and then Theo told
5 us take the banner down.

6 Q. Now, let me ask you about Theo. Have
7 you ever met Theo?

8 A. No.

9 Q. I'm just wondering because you seem
10 like you're on a first named basis with him,
11 calling him Theo.

12 A. What is -- I don't know his name.

13 Q. It's Theo Sedlmayr. So you have never
14 met him; you've never spoken with him --

15 A. He e-mailed us March 12th to take the
16 band banner down and that's it, and I took it
17 down.

18 Q. I was just wondering if you knew him
19 because you called him Theo, that was all?

20 A. That's all I knew him by Theo. I
21 don't know what other name to call him. What
22 does he call me?

23 Q. Do you know him?

24 A. I don't know him.

25 Q. Okay.

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2 A. Do we take content off?

3 Q. Yeah.

4 A. Yeah, if someone asks us to, we take
5 it off.

6 Q. Other than that, is there any process,
7 you know, to just periodically, I don't know,
8 reduce the number of videos that you have
9 posted or anything like that, whatever gets
10 posted it just stays up basically?

11 A. Until if someone says take it down, I
12 don't want it up, then I'll take it down.

13 Q. Have you ever removed any content from
14 the website other than the content that's at
15 issue in this lawsuit because somebody
16 claimed that it violated their trademark or
17 copyrights?

18 A. I mean, we get e-mails like that. We
19 take it down. That's pretty much what it
20 does.

21 Q. Other than the images in question
22 here, have you ever removed content from the
23 website because somebody told you that it
24 violated their copyright or trademark?

25 A. Yes.

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2 Q. On how many occasions would you say
3 that that has occurred?

4 A. In the beginning it was a lot. Now
5 not hardly any.

6 Q. Well, how many, total, would you say
7 that that has occurred since you started the
8 website?

9 A. '05.

10 Q. A hundred, more than a hundred?

11 A. It may be less -- may be less than a
12 dozen. I don't know.

13 Q. Haven't you actually indicated on your
14 website when material has been removed
15 because of a copyright claim?

16 A. What?

17 Q. Haven't you indicated, actually
18 indicated on your website when something has
19 been removed because of a copyright claim?

20 In other words, something will be
21 removed and in its place you would have some
22 kind of a notation, video removed copyright?

23 A. It don't say copyright. It says video
24 removed.

25 Q. You don't remember anything where